

REMARKS

The above amendments and following remarks are submitted in response to the Official Action of the Examiner mailed March 10, 2005. Having addressed all objections and grounds of rejection, claims 1-25, being all the pending claims, are now deemed in condition for allowance. Entry of this amendment and reconsideration to that end is respectfully requested.

Claims 1-25 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Publication 2002/0123993 in the name of Chau et al (hereinafter referred to as "Chau") in view of U.S. Patent No. 6,480,860, issued to Monday (hereinafter referred to as "Monday"). This ground of rejection is respectfully traversed as to the amended claims for the following reasons.

In rejecting claim 1, the Examiner states:

....Chau teaches "a document containing a plurality of elements formatted in XML (extensible markup language) transferred from said user terminal to said data base management system" at the Abstract and Page 1, [0014] by describing the background for the invention of transferring XML documents from the user system to a relational database....

These citations say nothing of transfer of an XML document from a "user terminal" to a "data base management system". The Abstract says nothing of the claimed "user terminal" and nothing of the claimed "transfer". The same is true of paragraph 0014, although the citation mentions "user" without defining whether the cited "user" is software, hardware, or a person. Furthermore,

paragraph 0014 certainly says nothing of transfer of an XML document. Perhaps most important, the Examiner has apparently based his rejection upon improper inferences drawn from the Abstract and Background of the Invention, because the detailed disclosure of the Chau specification and drawings do not even support such an inference.

Nevertheless, claim 1 has been amended above to make it absolutely explicit that the XML document containing the claimed service request is generated by the claimed user terminal. Furthermore, this generation occurs using a customized user interface wherein components of this customized user interface are provided by the claimed data base management system. The disclosed structure supporting these amendments is summarized at page 9, line 8, through page 11, line 14, of the specification. Detailed disclosure of this structure may be found in Figs. 24-26 and corresponding description at pages 45-47 of the specification.

The rejection of claim 1 as amended, and all claims depending therefrom, is respectfully traversed.

Claim 11 is an independent method claim having five steps as amended. In addition to the clearly erroneous findings of fact noted above, with regard to the rejection of claim 1, the amendments to claim 11 clearly require creation of the XML service request using components of the customized user interface

supplied by from the data base management system. The rejection of claim 11 as amended, and all claims depending therefrom, is respectfully traversed.

Claim 6 as amended is an independent apparatus claim having five primary elements. As with claim 1, claim 6 has been amended to make it completely explicit that the XML service request is generated by the claimed user terminal utilizing a customized interface wherein part of that customized interface is provided by the data base management system. This is an important aspect of the present invention, because it ensures efficient conversion of the XML service request when its creation is in part constrained by customized user interface components are supplied by the data base management system. The rejection of amended claim 6, and all claims depending therefrom, is respectfully traversed.

Claim 16 as amended is an independent apparatus claim having "means-plus-function" limitations. As with the rejection of claim 1, the rejection of claim 16 is based upon clearly erroneous findings of fact as explained above. Nevertheless, claim 16 has been amended to include a "creating means" to ensure that these distinctions are absolutely explicit. The rejection of claim 16 as amended, and all claims depending therefrom, is respectfully traversed.

Claim 21, as amended, is an independent apparatus claim having four basic elements. Though the rejection of claim 21 is deemed based upon clearly erroneous findings of fact as explained above, claim 16 has been amended to more precisely specify the structure utilized in the creation of the XML service request. AS previously explained, this arrangement provides certain format constraints to the XML service request to be created which greatly facilitates subsequent parsing of the XML service request. The rejection of claim 21, and all claims depending therefrom, is respectfully traversed.

Claims 2, 8, 14, 18, and 22 depend from claims 1, 7, 13, 17, and 21, respectively, and further limit the "XML mapping tree". As explained above, the alleged combination of Chau with Money does not render claims 1, 7, 13, 17, and 21 unpatentable. Therefore, the alleged combination cannot meet the further limitations of claims 2, 8, 14, 18, and 22. Therefore, the rejection of claims 2, 8, 14, 18, and 22 is respectfully traversed.

Claims 3 and 13 depend from claim 2 and 12, respectively, and are further limited by a DTD which describes the XML message. In making his rejection, the Examiner cites the last sentence of the Abstract of Chau which states:

The XML data is mapped from the application DTD to the relational tables and columns using the document access definition based on the Xpath data model.

Though this citation is not very clear, it seems apparent that it does not meet the requirements of the claim limitation. The rejection of claims 3 and 13 is respectfully traversed.

Claims 4, 7, 12, 17, and 24 depend from claims 3, 6, 11, 16, and 23, respectively, and are further limited by "storage space in which said XML mapping tree is stored for future use". In making his rejection, the Examiner cites a number of paragraphs which say nothing of the claimed "storage space" or "future use". Furthermore, the Examiner continues to confuse DAD with DTD.

Paragraph 134 at page 8 describes DAD as:

"The DAD itself is a tree structure XML document."
It is respectfully suggested that the Examiner review Chau, paragraphs 130-134, for a greater understanding of the term. This is readily distinguishable from a DTD which is not an XML document. Chau provides an example of a DTD at paragraphs 123-125. It is respectfully requested that the Examiner clearly distinguish these different terms in making rejections of the claims. The rejection of claims 4, 7, 12, 17, and 24 is respectfully traversed.

Claims 5 and 20 depend from claims 4 and 19, respectively, and are further limited by displaying the XML mapping tree within a window. Though the Examiner cites a number of paragraphs from Chau and further confuses the functionality of the DAD, it is most clear that Chau says nothing and shows nothing of displaying

anything as a window. The rejection of claims 5 and 20 is respectfully traversed.

Claims 9, 15, 19, and 25 depend from claims 8, 14, 18, and 24, respectively, and further limit the "publicly accessible digital data communication network". As explained above, the alleged combination of Chau and Money does not meet the limitations of claims 8, 14, 18, and 24, from which claims 9, 15, 19, and 25 depend. Therefore, the alleged combination cannot meet the further limitations of these claims. The rejection of claims 9, 15, 19, and 25 is respectfully traversed.

Claim 10 depends from claim 9 and is further limited by a hierarchical XML mapping tree. Again, the Examiner confuses the functionality of the DAD. The rejection of claim 10 is respectfully traversed.

In rejecting claim 23, the Examiner cites Figs. 5-6 and paragraph 0055 of Chau. Figs. 5-6 say nothing of the claimed invention. Paragraph 0055 is even less helpful in stating:

Different types of applications can benefit from the use of the XML System. Some illustrations follow:

The rejection of claim 23 is respectfully traversed.

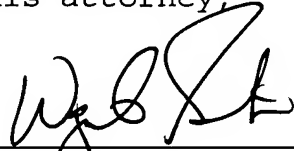
Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-25, being the only pending claims.

Please charge any deficiencies or credit any overpayment to
Deposit Account No. 14-0620.

Respectfully submitted,

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By his attorney,



Date June 9, 2005

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